



HUNT MANAGEMENT SERVICES, LLC

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August 5, 2004
Submitted electronically

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Dr. George Lucier
Dr. Richard Denison
Environmental Defense

Dear Drs. Lucier and Denison:

Thank you for your comments of June 24, 2004 regarding the 2,6,8-Trimethyl-4-Nonanone (CAS 123-18-2, IBHK) test plan dated December 19, 2003. Following are our responses.

Q: Are data available on amounts of IBHK in waste streams or products, workplace monitoring and testing for residues in the general environment in proximity to where it is used?

A: We have found no environmental monitoring data for any of the limited uses of IBHK.

Q: We recommend that the test substance for the toxicology studies represent the composition of the marketed material, which may contain as much as 4% nonanol, 2,6,8-Trimethyl.

A: Dow will test the material that is offered for sale into the industrial marketplace. In addition, the test material will be completely characterized as required under Good Laboratory Practices.

Q: Has IBHK or the corresponding nonanol impurity been tested for hormonal activity by in-vitro screening methods?

A: No. IBHK has not been tested for hormonal activity. There are currently no validated test methods for such screening. In addition, in-vitro hormonal screening is not a requirement of the HPV Chemical Challenge Program.

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If you have any questions regarding this submission, please contact me at (703) 669-5688.

Sincerely,

Elizabeth K. Hunt
Executive Director

Cc: T. Cawley, Dow